



Wright, Constable & Skeen, L.L.P. Attorneys at Law

One Charles Center, 16th Floor • 100 N. Charles Street • Baltimore, Maryland 21201-3812 • 410-659-1300 • Fax 410-659-1350

October 10, 2003

Writer's Direct Dial/E-mail:
(410)659-1312 mfried@wcslaw.com

Douglas G. Worrall
Michael J. Abromaitis
Monte Fried
James W. Constable
David W. Skeen
Robert W. Hesselbacher, Jr.**
James D. Skeen*
Kenneth F. Davies
Stephen F. White
Lois Fenner McBride
Frederick L. Kobb
Paul F. Evelius
Mary Alice Smolarek*

Associates

Michael A. Stanley
Howard S. Stevens*
Victoria August
Joy K. Sakellaris

Of Counsel

Francis N. Iglehart
P. McEvoy Cromwell

Wm. P. Constable (1882-1976)
John D. Wright (1903-1976)

Towson Office

307 West Allegheny Avenue
Towson, Maryland 21204-4258
Phone 410-825-0750
Fax 410-825-0715

www.wcslaw.com

Honorable William M. Nickerson, Sr.
United States District Court for the District of Maryland
Garmatz Federal Courthouse
101 W. Lombard Street
Baltimore, MD 21201

Re: Beth O. Scott v. Life Insurance Company of
North America
Case No.: WMN 03 CV 524
United States District Court for
the District of Maryland

Dear Judge Nickerson:

The above-referenced case has been brought under ERISA, and the Plaintiff seeks, among other things, a reversal of the Defendant's decision to terminate long term disability benefits.

Under the existing revised Scheduling Order, Motions for Summary Judgment are due on October 27, 2003.

Since we last wrote to you, the parties have been discussing various proposals for resolving of this matter without further litigation, and based on their progress to date, the parties believe that continued discussions would be beneficial to all concerned. Accordingly, counsel for the Plaintiff and the Defendant **jointly** and respectfully request that the current Scheduling Order be revised so that the deadline for filing Motions is extended until December 1, 2003.

*Admitted in the District of Columbia and Maryland

*Admitted in the District of Columbia, Maryland and Virginia

The Honorable William M. Nickerson, Sr.
October 10, 2003
Page 2

Favorable consideration of this request will be greatly appreciated.

Respectfully,

/s/

Monte Fried
Attorney for Defendant,
Life Insurance Company of
North America

MF/acg

cc: Carrie J. Feit, Esq. (via e-filing)
Howard J. Bernstein, Esq. (via e-filing)